



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10

1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140

DEC 9 2014

OFFICE OF
COMPLIANCE AND ENFORCEMENT

Reply to: OCE-133

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

NOTICE OF VIOLATION

Mr. Gordon Lindquist
Kanaway Seafoods Inc.
dba Alaska General Seafoods
6425 NE 175th Street
Kenmore, Washington 98028

Re: July 16, 2014, NPDES Compliance Inspection
NPDES ID Number AKG520168

Dear Mr. Lindquist:

On behalf of the United States Environmental Protection Agency (EPA), I would like to express my appreciation for your time and cooperation during the July 16, 2014, federal Clean Water Act (CWA) inspection of your facility. The purpose of the inspection was to gather information regarding your operation as part of an overall and ongoing evaluation of the compliance status of your facility with the CWA and the Seafood General Permit (Permit). During the inspection, EPA found the following violations:

Notice of Intent: Part IV.A.5 states "A permittee authorized to discharge under this permit shall submit to EPA and ADEC an updated and amended NOI when there is any material change in the information submitted within its original NOI."

During the inspection, a Notice of Intent was not present at the facility for inspectors to review. A post inspection email from Ms. Best stated that there had been no changes to your facility since the 2006 NOI. However, the 2006 NOI indicates that the facility uses three Vaughn choppers and two Auto grinders. During the inspection, EPA documented your facility using a Taskmaster grinder to grind waste from the filleting line, and two Muffin Monster grinders to grind wastewater from the main grinder sump. Changing the grinder system is a material change in the information provided in the 2006 NOI. Failure to submit an updated and amended NOI when there is a material change is a violation of Part VI.A.5 of the Permit. Please submit an updated NOI (see enclosure) that reflects these changes within 30 days of receipt of this letter to the following address:

Alaska Department of Environmental Conservation
Division of Water
555 Cordova Street
Anchorage, AK 99501

Grind size: Part V.C.1.b of the Permit states "A permittee shall route all seafood processing wastes through a waste conveyance and treatment system. The waste solids discharged from its outfall(s) shall not exceed one-half (0.5) inch in any dimension."

During the inspection, the inspector noted that the effluent sample contained pieces of fish waste larger than a 0.5 inch. EPA also noted during the review of the annual reports on-site that in 2012, on 17 occasions, your facility exceeded the grind size. According to the 2013 Annual Report provided during the inspection, your facility reduced the number of grind size exceedences to only one instance. Through the records review, inspectors documented your facility's efforts to comply with the 24-hour noncompliance reporting requirement contained in Part VII.B of the Permit. Failure to grind waste to a 0.5 inch is violation of Part V.C.1.b of the Permit.

It is EPA's goal to ensure facilities comply fully with their permits, but the ultimate responsibility rests with the facility. As such, we encourage your company to continue its efforts to maintain full knowledge of the Permit requirements and to take appropriate measures to ensure full compliance.

If you have any questions or concerns regarding this matter, please contact Tara Martich, NPDES Compliance Officer, at (907) 271-6323.

Sincerely,



Edward J. Kowalski
Director

Enclosure

cc: Brian Doyle
Alaska Department of Environmental Conservation

NOTICE OF INTENT

to be covered under
APDES GENERAL PERMIT AK-G52-0000
for
SEAFOOD PROCESSORS IN ALASKA
(See Part IV.C. of the Permit, reissued 2001)

Please submit this NOI to:

Department of Environmental Conservation
Division of Water

555 Cordova Street
Anchorage, AK 99501

Submittal of this document constitutes notice that the party identified in Section 1 intends to be covered by the APDES general permit authorizing discharges from seafood processing activities in Alaska and obligates the permittee to comply with the terms and conditions of the permit.

Please fill in all information. Attach supplemental information sheets as appropriate.

SECTION 1 - PERMIT INFORMATION

APDES PERMIT NO.
AK-G52 -

ADEC Number
(Seafood Processor License)

SECTION 2 - OPERATOR INFORMATION (Part IV.C.2)

Company Name

Address

Phone

City/State/Zip

FAX

Representative/Title

E-mail

SECTION 3 - OWNER INFORMATION (Part IV.C.3)

Owner Name

Address

Phone

City/State/Zip

FAX

Representative/Title

E-mail

SECTION 4 - FACILITY or VESSEL INFORMATION (Part IV.C.4)

Facility/Vessel Name

No of Employees

Address

Phone

City/State/Zip

FAX

Latitude and Longitude of Discharge(s)

Previous facility/vessel name(s)

Type of vessel

USCG no.

Vessel length

SECTION 5 - FACILITY CLASSIFICATION (Part IV.C.5; Check each that applies)

☐

Offshore floating seafood processor: operating and discharging between 1 and 3 nautical mile from shore at MLLW

☐

Nearshore floating seafood processor: operating and discharging from one (1) to one half (0.5) nautical mile from shore at MLLW

☐

Shore-based seafood processor: operating and discharging less than one half (0.5) nautical mile from shore at MLLW
(Includes vessels that meet discharge location criteria)

SECTION 6 - PROJECTED PRODUCTION INFORMATION (Part IV.C.6; Check all that apply)

| | | | | |
|---------------------------------|--|--|---|--|
| <input type="checkbox"/> Whole | <input type="checkbox"/> Head-on & Guttled | <input type="checkbox"/> Headed & Guttled | <input type="checkbox"/> Fillets | <input type="checkbox"/> Cured, salted or smoked |
| <input type="checkbox"/> Canned | <input type="checkbox"/> Fish meal | <input type="checkbox"/> Surimi, fish paste | <input type="checkbox"/> Mince, dry/ washed | <input type="checkbox"/> Mince, wet/ unwashed |
| <input type="checkbox"/> Roe | <input type="checkbox"/> Crab: whole, pieces | <input type="checkbox"/> Shrimp, scallops, clams, oysters, snails, urchins, cucumbers (circle appropriate items) | | <input type="checkbox"/> Other (identify): |

| Catch Processed (by type, e.g., cod, pollock, salmon) | Finished Product (by type, e.g., fillets, surimi, canned) | 24-hour Design Capacity in lbs of processing raw product | Location (Lat/Long or ADF&G areas) | Anticipated Processing Activity – Number of days per month | | | | | | | | | | | |
|---|---|--|--|--|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|
| | | | | Jan | Feb | Mar | Apr | May | Jun | Jul | Aug | Sep | Oct | Nov | Dec |
| | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | |

SECTION 7 - RECEIVING WATER INFORMATION (Part IV.C.7)

Name(s) of waterbody(ies) receiving discharges of the facility

Name of any larger, adjacent receiving waterbody(ies)

List any areas within three (3) nautical miles of operation which are excluded from coverage under the General Permit (e.g., Parks, Preserves, Refuges, Critical Habitats etc.)

Nature of Receiving Water: Discharge is to marine water ☐

Discharge is to fresh water ☐

Discharge is to estuary or tidal tributary ☐
Attention: Nearshore and Shore-based Processors must submit a bathymetric map of the receiving water within one (1) nautical mile of the discharge showing the location of the facility and all discharge point(s)

SECTION 8 - DESCRIPTION of DISCHARGES (Part IV.C.8)**Sanitary Wastes**

| | | | |
|--------------------------|----------------------------------|--------------------------|-------------------------|
| <input type="checkbox"/> | Package Treatment Plant | <input type="checkbox"/> | Municipal System |
| <input type="checkbox"/> | On-site septic system | <input type="checkbox"/> | Community Septic system |
| <input type="checkbox"/> | USCG Approved System (MSD) Type: | | Capacity (gals/day): |

Seafood Processing Wastes

| | | | | | |
|---|-----|------------------------------|-----|-------------------------|------------|
| Outfall depth: | ft. | Outfall distance from shore: | ft. | Water depth at outfall: | ft. |
| Vessels indicate the range of water column depths at which vessel discharges processing wastes: | | | | | to ft. |
| Grinder - Type/Name: | | Grinds seafood wastes to: | | | inch width |

Other Wastewaters (Check all that apply)

| | | | |
|--------------------------|-----------------------|--------------------------|--------------------|
| <input type="checkbox"/> | Process disinfectants | <input type="checkbox"/> | Transfer water |
| <input type="checkbox"/> | Cooling water | <input type="checkbox"/> | Gray water |
| <input type="checkbox"/> | Boiler water | <input type="checkbox"/> | Live tank water |
| <input type="checkbox"/> | Cooking water | <input type="checkbox"/> | Air scrubber water |
| <input type="checkbox"/> | Refrigerated seawater | <input type="checkbox"/> | Other (name): |

Projected Maximum Quantity in lbs of Process Waste Solids that are Discharged

| Specific Species Processed | TOTAL DAILY Amount of Solids Discharged | TOTAL ANNUAL Amount of Solids Discharged |
|----------------------------|---|--|
| | lbs. | lbs. |
| | lbs. | lbs. |
| | lbs. | lbs. |

SECTION 9 - REFUELING CAPABILITY and PROXIMITY TO FUELING STATIONS (Part VI.C.9)

Does your facility/vessel refuel fishing vessels? Yes ☐ No ☐ If no, what is the location and distance to the nearest refueling station?
If yes, what is the capacity of your refueling tanks?

SECTION 10 - SUBMITTALS (Part IV.C.10; to be attached to this NOI) * shore-based & near-shore processors only

| | |
|--------------------------|--|
| <input type="checkbox"/> | Letter certifying that the facility has developed and operates in accordance with a Best Management Practices Plan |
| <input type="checkbox"/> | Location Map showing the location of the facility in the context of the coastal area of Alaska * |
| <input type="checkbox"/> | Bathymetric Map of Receiving Water showing facility, outfall and water depths within one mile of the discharge * |
| <input type="checkbox"/> | Waiver Request (for seafloor survey, discharging to excluded areas (Part III.A,B,C), if applicable |

SECTION 11- SIGNATURE and CERTIFICATION (Part IV.C.11)

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

| | |
|-----------------------------------|---------------|
| Signature Principal or Partner | Title/Company |
| Print Name | Date |